

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative

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Docket No. N2011-1

RESPONSES OF NATIONAL NEWSPAPER ASSOCIATION WITNESS HEATH
TO USPS/NNA T1 1-6
(October 6, 2011)

National Newspaper Association hereby provides the responses of its witness Max Heath, NNA T1, to USPS/NNA T1-1 T1-6, submitted on September 30, 2011. The interrogatories are restated verbatim. The response follows each interrogatory.

Respectfully submitted,

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USPS/NNA-T1-1. Please refer to your testimony on page 2, lines 11 through 16.

You state, "Our membership numbers indicate that new newspapers are being started, and though some are being closed, overall our industry remains reasonabl[y] steady. The negative impacts we face are mostly from the general economic malaise in the nation, not from digital competition." Please provide any documents you relied upon in support of the portion of your testimony quoted above.

RESPONSE: I have not conducted an exhaustive study of newspaper start-ups and shut downs. My observations are drawn from conversations with publishers and others, and from NNA membership records. I am often surprised at the number of people contacting me wanting to start a community newspaper in this difficult economy, but it is often to fill a news gap in a geographic area. Also my interaction with USPS's PCSC in New York on permit approvals and their reinforcement that both new magazine and new newspaper titles are being started. Below is a list of our newly-founded newspaper members, along with some new newspapers that have not yet joined.

Title	Founded	Joined	City	State
Port Arthur Business Journal	09/01/10	3/1/11	Beaumont	TX
Elizabethtown Advocate,	02/01/10	4/1/11	Elizabethtown	PA
The Washington County Observer	02/01/10	4/1/11	West Fork	AR
GA Voice	01/01/10	Non- member	Atlanta	GA

Independent Voice of the People's Republic of Blythewood, The	01/01/10	6/1/10	Blythewood	SC
Wahiawa Agenda, The	01/01/10	Non-member	Wahiawa	HI
Pinckneyville Press, The	07/01/09	1/1/10	Pinckneyville	IL
Waupaca County Post-West	03/01/09	Non-member	Waupaca	WI
Cleveland Current, The	02/01/09	4/1/09	Cleveland	MS
Portland Daily Sun The	02/01/09	2/1/09	South Portland	ME
Coast Lake News	01/01/09	9/1/11	Lakeside	OR
Gering Citizen	01/01/09	6/1/10	Gering	NE
Suburban Newspaper, The	01/01/09	2/1/10	Duncanville	TX
Wilson County Citizen	11/12/08	Non-member	Fredonia	KS
Barrow Journal, The	10/01/08	3/1/11	Winder	GA
Opelika Observer	10/01/08	2/1/10	Opelika	AL
Urban Views Weekly	06/01/08	4/1/09	Richmond	VA

Carolina Forest Chronicle	01/01/08	3/1/09	Myrtle Beach	SC
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Vero Beach 32963	01/01/08		Vero Beach	FL
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USPS/NNA-T1-2. Please refer to your testimony on page 3, lines 28 through 29.

You state, “The Postal Service has a special obligation to serve rural areas.”

Please confirm that the basis for your claim is 39 U.S.C. § 101(b). Additionally, please identify any other statute, regulation, or policy that provides a basis for your assertion.

RESPONSE:

I am not an attorney, so I do not tend to consult the US Code in my consideration of the needs of mail users and the Postal Service's provision of services. But I am aware that Congress has for many years paid particular attention to the needs of rural America when it discusses the Postal Service's mandate. The Commission's 2008 Report on Universal Postal Service and the Postal Monopoly, for instance, laid out an excellent history of Congressional consideration of serving the needs of a wide nation, including rural America.

USPS/NNA-T1-3. Please refer to your testimony on page 8, lines 21 through 24. You state, "The loss of a local entry office would be enough to force many publishers out of the mail." Please provide any documents you relied upon in support of your statement.

RESPONSE:

Publishers, of course, do not usually make distribution decisions based on a single factor. The totality of change in USPS direction, however, is affecting many newspapers, in my judgment as an industry consultant. The potential loss of 6-day mail, trouble with local entry stemming from Sarbanes-Oxley compliance, BME consolidations, Delivery Unit Optimizations, slower service from plant closings and the threat of much higher rates, such as the Obama Administration has proposed, are all major factors for a publisher trying to decide how to distribute.

Since the prior post office closings have not yet cut deeply into the levels of newspaper entry offices, I have not yet seen a wide industry response on post office closings alone. But I do regularly consult with newspapers having a problem with local mail entry. I am also aware of some of NNA's larger group newspapers, such as Community Newspaper Holdings, as well as some of our daily newspapers, such as the Brookhaven (MS) Daily Leader, who were poised to end their own home delivery and move to the mails until a round of bad postal news came out. The 6 day mail issue as well as local entry problems are discouraging to these businesses.

For example, below is an email the High Plains Sentinel, which learned that it would be prohibited from dropping newspapers at its local post office, which is a contract postal unit, and another from the Ord Quiz in Nebraska, with concerns about local entry. It is a good example of the problems I expect we will face if many smaller offices are replaced with VPOs or CPUs, unless USPS changes its policy on newspaper entry.

I want to emphasize, however, that NNA's concern is not necessarily with maintaining the post office, but in maintaining privileges to drop newspapers locally. The fact is: if

the Postal Service cannot get the newspaper out within a day of entry, most publishers will be unable to use the mail.

[Email document begins]

From: Wright News [mailto:hpsentinel2@yahoo.com]

Sent: Tuesday, August 30, 2011 4:57 PM

To: Max Heath

Subject: Wright Post Office

Max,

I talked to Lori Gilbertson at the post office here in Wright. She told me that she spoke with Renee Riggs and was told we cannot drop our papers here because she is a contract office. I told Lori that we had filed for exceptional dispatch and she said she hopes we get it.

A couple of hours later, she told me that even if we get approved, the papers will still not be put in the boxes on Thursdays. The rules for her have changed also so she wouldn't be able to put the papers in the boxes until Friday. She said there will not be any same day delivery for her anymore. So unless we can get our papers to us on Wednesdays, we have another roadblock in our path.

Thank You,

Amy Winger

High Plains Sentinel

PO Box 457

Wright, WY 82732

Office: (307) 464-0262

Wright, Wyoming, and a couple of other emails I have had from people concerned about losing timely delivery because of entry problems.

From: Quiz Publisher [mailto:quizpub@frontiernet.net]

Sent: Tuesday, September 13, 2011 3:55 PM

To: Max Heath

Subject: postal closings

We are a small circulation newspaper, 2,000. My biggest concern at this time is delivery. It seems that out of state delivery for Snow Birds and people who have moved

away is very poor. Some papers take 10 days for delivery, some never even arrive, then they call and want us to send them a paper first class, which runs us about \$4. Saturday closings would just make it worse than it already is. Plus we have several small town Post Offices that are fairly close, and some of those take three to four days for delivery. If they close, again a big delay in delivery, which hurts our advertisers, because their ads do not get out in a timely manner.

The Ord Quiz

Ord, NE 68862

USPS/NNA-T1-4. Please refer to your testimony on page 11, lines 25 through 26. You state, “the Postal Service must maintain at least overnight delivery for our in-county and surrounding-county newspaper issues dropped at the delivery office.” (Emphasis in the original.) Please identify the statute, postal regulation, or policy that establishes this requirement.

RESPONSE:

Because Sarbanes-Oxley requirements for more rigorous mail verification, previously unknown within our customers who regularly enter virtually identical products from week to week, many newspapers in the past several years have encountered serious barriers to mail entry.

As a result, the Postal Service instituted a revision in overnight acceptance policy for newspapers. It appears in postal policy as a section in the Business Mail Acceptance Manual 109 5-5.1 and recognizes the ability of newspapers to engage in overnight drop at a local post office for purposes of next day delivery, with verification of the entry to be conducted following acceptance. I have provided a copy of it below.

The following version of this policy has been in effect as implemented by Business Mail Acceptance, and has been restricted to newspapers with fewer than 300,000 copies in the mail each year, but at NNA’s request I understand the policy has just been increased to 500,000 copies per year. The policy restores long-standing practices for mail entry for community newspapers. I believe it may also set the stage for the Postal Service to continue providing reliable local mail service, even if the paperwork “entry” is conducted at a more distant office, so long as the newspaper bundles can be dropped at a local office, whether that is a USPS owned office, a contract office or a Village Post Office that maintains box section service.

5-5.1 Overnight Drop of Time-Sensitive Periodicals at Small Post Office Locations

The Postal Service allows an exception to timely entry requirements for time-sensitive Periodicals mailings deposited at origin post offices after business hours (late night or early morning), commonly referred to as overnight drops.

Publishers may make an overnight drop as long as the origin post office approves it and the publisher guarantees that sufficient funds are deposited in their advance deposit account to ensure that a negative balance does not exist. Publishers must understand that regardless of the date entered in the “Date of Mailing” field on the postage statement, all classes of mail, including Periodicals, deposited after BME Critical Acceptance Time (CAT) shall receive the next day’s date recorded in the “Mailing Date” field in *PostalOne!* The “next day” is defined as the first possible processing day after the mail is deposited.

In the scenarios below, the postage statement and marked copy of the publication (if applicable) must be provided with the mail unless and until a publication has been approved for the alternative verification process by USPS Headquarters. A publication that has such approval may submit postage statements and supporting documentation no later than 11:00 A.M. on the following business day that the drop occurs — or no later than 11:00 A.M. on the next business day following a weekend or holiday period when acceptance personnel are not available. Saturdays and Holidays shall be included as a “business day” for sites open to the public on those days. The postage statement must be entered into *PostalOne!* immediately upon receipt to ensure that postage is properly collected and reported. Postage statement entry must be governed according to the overnight drop mailing scenarios described below:

- *Overnight Drops occurring after close of business during the business week:* The postage statement and marked copy (if applicable) must be submitted no later than 11:00 A.M. the following business day, and the postage statement must be entered into *PostalOne!* immediately upon receipt to ensure that postage is properly collected and reported. Since the mailing was deposited after CAT the previous business day, the date entered in the “Date of Mailing” field on the postage statement and the date recorded in the “Mailing Date” field in *PostalOne!* should be the same.
- *Overnight Drops occurring after close of business for a non-Holiday weekend:* The postage statement and marked copy (if applicable) must be submitted no later than 11:00 A.M. of the next business day following the weekend closing, and the postage statement must be entered into *PostalOne!* immediately upon receipt to ensure that postage is properly collected and reported. Since the mailing was deposited after CAT the previous business day, the date entered in the “Date of Mailing” field on the postage statement and the date recorded in the “Mailing Date” field in *PostalOne!* may vary by no more than the number of non-business days from the drop date to the next business day.

Example: If the mailing is dropped after CAT Friday at 3:00 A.M. Saturday morning and released to Operations, the postage statement must be received and finalized in *PostalOne!* on Monday. The “Mailing Date” (the day the mail arrives for verification and acceptance) is Saturday, the “Certification Date” (the date *PostalOne!* shows the mail was finalized in the system) in *PostalOne!* is Monday, and the date variance is three (3) days.

- *Overnight Drops occurring after close of business for a Holiday weekend:* The postage statement and marked copy (if applicable) must be submitted no later than 11:00 A.M. of the next business day following the Holiday, and the postage statement must be entered into *PostalOne!* immediately upon receipt to ensure that postage is properly collected and reported. Since the mailing was deposited after CAT the previous business day, the date entered in the “Date of Mailing” field on the postage statement and the date recorded in the “Mailing Date” field in *PostalOne!* may vary by no more than the number of non-business days from the drop date to the next business day.

Example: If the mailing is dropped after CAT Friday at 3:00 A.M. Saturday morning and released to Operations, the Holiday is on Monday, and the postage statement must be received and finalized in *PostalOne!* on Monday. The “Mailing Date” is Saturday, the “Certification Date” in *PostalOne!* is Tuesday, and the date variance is four (4) days.

- *Overnight Drops occurring after close of business for a mid-week Holiday:* This scenario is governed by the same procedures detailed above in Overnight Drops occurring after close of business for a non-Holiday weekend.

5-5.1.1 Verification of Overnight Drop of Time-Sensitive Periodicals at Small Post Office Locations

Acceptance employees are required to adhere to the following mail acceptance policy for low circulation and mail volume Periodicals that meet the criteria outlined below. Periodicals affected by this policy are commonly referred to as newspapers and are produced to provide predominately local time-sensitive information, news, and events to a subscription or requester base of recipients. These Periodicals are mailed at frequencies weekly or more often. Due to the challenges regarding publication of these time-sensitive publications and the limitations on business mail acceptance capabilities where the publication’s accounts are held, local origin acceptance offices have allowed these types of Periodicals to be dropped at local office or local delivery offices after normal business mail acceptance hours so they can be processed for timely delivery. This policy supersedes all current HQ, Area, and District acceptance and verification procedures for these newspaper Periodicals that have been authorized to enter the mailing at Post Offices or local postal delivery facilities so that they can be processed for timely delivery.

This policy regarding the application of non-standard verification processes only applies to publications currently authorized to mail

under Periodicals privileges (Periodicals authorization approved or an application to mail at Pending Periodicals privileges has been filed and fees paid prior to November 16, 2009) and the publication was granted authorization to drop overnight by the Origin Entry acceptance office Postmaster prior to the effective date of this policy. This policy is *effective November 16, 2009*.

All requests for authorizations for Overnight Drop for Time- Sensitive Periodicals after November 16, 2009, must be approved by the District Manager Business Mail Entry who, in addition to notifying the requesting publisher, must also forward notice of publisher approval to his/her respective Area Customer Service Programs Analyst and Business Mail Acceptance HQ. All future authorizations to mail as Overnight Drop for Time-Sensitive Periodicals will require the publications to use the electronic features offered in the *PostalOne!* system. Publishers will be required to submit all postage statements and supporting documentation electronically to the *PostalOne!* system. Exceptions to this requirement can only be approved by the Manager, Business Mail Acceptance, HQ, USPS.

Publications authorized for acceptance under this procedure must meet all of the following criteria:

- Mail less than 300,000 copies annually.
- Mail less than 5,000 copies per postage statement.
- Mail at a frequency of weekly or more often.
- Are authorized to deposit mailings after mail acceptance hours or in time to meet scheduled transportation.
- Are deposited at the office where the publication account is maintained or at a designated local delivery facility as identified by the Postmaster of the origin entry office.
- Are primarily (50% or more of the mailed distribution) for In-County distribution within the local area of the Known Office of Publication (KOP).
- Funding for mailings must always be on account prior to deposit of the mailing.
- Can be used with or may be more effectively accepted under an Exceptional Dispatch procedure.
- Would not be more effectively accepted using a drop shipment procedure.

In some cases a Publication can meet all of the criteria identified above except for the total pieces in the mailing may exceed 5,000 copies. Publishers may request an exception to the mailing volume criteria in writing to the District Manager Business Mail Entry. These requests will be handled and approved on a case by case basis. There will not be any exceptions for mailings that exceed 10,000 copies per mailing.

Publications authorized as "overnight drop for time-sensitive periodicals" will not be subjected to all required acceptance processes as other mailings as defined in the DM 109. Since these Periodicals publications will often have been processed for delivery or may have to immediately be loaded onto USPS transportation for critical dispatch, they may not always be subjected to cursory or in-depth verification

procedures. Though these required verification procedures may be waived in the interest of timely dispatch or delivery, acceptance offices should always attempt to per-form (at least cursory level) as much verification as possible (couple of sacks/bundles) without disrupting the established service expectation of the publisher.

This policy does not provide any exceptions for the annual verifications required for all Periodicals publications. Annual verifications must be performed as required by the DM 109. The annual reviews require verification of the information reported by the publisher on the Statement of Ownership, Management, and Circulation (PS Form 3526), eligibility, advertising, frequency, and postage statement accuracy.

The origin acceptance office must ensure that it follows policy established in Management Instruction DM-707-2009-2 on acceptance procedures for marked copies and postage statement process for Overnight Drop for Time-Sensitive Periodicals (pg.15). Whenever possible publishers of Periodicals granted this authorization should be encouraged to transition to using the electronic documentation features available through the *Posta/One!* system.

The origin acceptance office must notify all processing/ delivery facilities of any Periodicals publications they have authorized for Overnight Drop for Time-Sensitive Periodicals and provide them with the publication title, the frequency and the planned drop day/time, and approximate volume. This notification will not be required for mail being dispatched to meet critical dispatch times. The origin acceptance office must ensure that there are adequate notification processes in place for the facilities where the mail is being dropped at or dispatched to for reporting problems associated to the publication (e.g., missing frequency of drops, preparation or sort problems, dropping mail other than that specifically authorized or volumes in excess of 5000 copies). When problems are reported the origin acceptance office must take immediate action and contact the publisher to remedy them. Failure on the publisher's part to adhere to the conditions of the authorization or meet mailing requirements may result in an immediate suspension of this privilege requiring the publisher to submit their mailings during scheduled hours of operation for acceptance.

Modifications to the *Posta/One!* system and the Performance Based Verification model strengthen verification procedures for the annual verifications required on mailings authorized to mail at Periodicals prices.

Modifications to the *Posta/One!* system also provide a checkbox on the Account Management Edit Permit/Periodical page to designate the publication "Overnight Periodicals". When this box is checked, no verification will be requested by the system and the statements for those publications will be excluded from the verification performance reports.

"Overnight Periodicals" is a reason for non-performance of verification in *Posta/One!* and also track that annual reviews are being conducted and all required verifications are per-formed during the review.

5.5.2 Time-Sensitive Periodicals Dropped Outside of Business Mail Acceptance Hours

This document provides mail acceptance policy and guidelines to ensure proper acceptance and verification of Periodicals not authorized as Overnight Drop Time Sensitive Periodicals.

Time-Sensitive Periodicals are defined as a Publication having a frequency of weekly or more often and are primarily published for the dissemination of news or other current event information to a list of paid subscribers or requestors. These Periodical mailings can be allowed to drop their mailings outside of normal acceptance hours because a portion of the mailing is prepared at a level where the office can provision it for delivery on the day it is dropped. There is no service standard commitment to provide this level of delivery service but where possible the Postal Service tries to deliver these Time-Sensitive publications in the interest of providing the public with relevant and current news.

5.5.2.1 Time-Sensitive Periodicals Dropped Outside of Normal Acceptance Hours (Not Authorized as Overnight Drop Periodicals)

The Postal Service recognizes the importance of timely delivery of all Time-Sensitive Periodical publications. However the Postal Service also has to adhere to its responsibilities regarding our financial controls. Arrangements can be made between the Publisher and the Origin Mail Acceptance office to accommodate for the depositing of time-sensitive Periodicals mailings (not authorized as a Time-Sensitive Overnight Drop Periodical) after business hours (late night or early morning).

Time Sensitive Periodicals that can be dropped outside of normal acceptance hours should meet the following criteria:

- Are authorized to deposit mailings after mail acceptance hours.
- Mail at a frequency of weekly or more often.
- Are deposited at the office where the publication account is maintained or at a designated local delivery facility as identified by the Postmaster of the origin entry office.
- Are primarily (50% or more of the mailed distribution) for In-County distribution within the local area of the Known Office of Publication (KOP).
- Funding for mailings must be on account prior to deposit of the mailing.
- Must present the postage statement and supporting mailing documentation and the Marked Copy (if applicable) with the mailing or to the acceptance unit during the business hours prior to the drop day. Whenever possible publishers of Periodicals granted this authorization should be encouraged to transition to using the electronic documentation features available through the *PostalOne!* system.

- The Publisher must physically segregate segments (CRRT and delivery service area 5 DGT preparation levels) of the mailing that is for the same day delivery of the office from the segments (CRRT, 5 DGT non-service area ZIP codes and 3 DGT, ADC, or MXADC preparation levels) of the mailing.

Publishers may make an overnight drop as long as the origin post office approves it and the publisher guarantees that sufficient funds are deposited in their advance deposit account prior to depositing of the mailing. Publishers must understand that regardless of the date entered in the "Date of Mailing" field on the postage statement, all classes of mail, including Periodicals, deposited after BME Critical Acceptance Time (CAT) shall receive the next business day's date recorded in the "*Mailing Date*" field in *PostalOne!* The "next day" is defined as the first possible processing day after the mail is deposited. Failure on the publisher's part to adhere to the conditions of the local agreement or meet mailing requirements may result in an immediate suspension of this privilege requiring the publisher to submit their mailings during scheduled hours of operation for acceptance.

5-5.2.2 Verification for Dropping Time-Sensitive Periodicals (not Authorized Overnight Drop) Deposited Outside of Mail Acceptance Business Hours

This policy does not provide any exceptions for the annual verifications required for all Periodicals publications. Annual verifications must be performed as required by the DM 109. The annual reviews require verification of the information reported by the publisher on the Statement of Ownership, Management, and Circulation (PS Form 3526), eligibility, advertising, frequency, and postage statement accuracy.

Periodicals allowing deposit outside of regular Mail Acceptance business hours must be verified according to existing policies on mail verification. Employees are required to adhere to the following mail acceptance policy for Periodicals meeting the criteria outlined below.

The origin acceptance office must notify all processing delivery facilities of any Periodicals publications they have agreements for dropping Time-Sensitive Periodicals outside of acceptance business hours and provide them with the publication title, the frequency and the planned drop day/time, and approximate volume. This notification is separate and distinct from notifications provided regarding Time-Sensitive Periodicals Authorized Overnight Drop.

The origin acceptance office must make arrangement with mail processing delivery operations to retain mail for verification purposes or provision resources to conduct verification prior to mail entering processing.

The origin acceptance office make arrangements with mail processing delivery operations to provision reporting to acceptance regarding any issues (e.g., missing frequency of drops, preparation or sort problems, out of sequence, dropping mail not specifically authorized or volumes exceeding what is reported on the documentation) with the segments

of a mailing that are being processed for delivery. Generally speaking this will be preparation levels of the mailing that are carrier route sorted or in 5 digit bundles for the delivery office (usually In-County but in some areas may include some Out-Side County). When problems are reported the origin acceptance office must take immediate action and contact the publisher to remedy them.

All other preparation levels of the mailing that are not for the immediate delivery office processing can be held for verification once the acceptance office opens for business. The segments of the mailing retained will be subjected to verification as required by policy or requested by the *PostalOne!* system. If verification of the mailing identifies presort or other mailing standard errors/discrepancies then the acceptance unit must make arrangements with the delivery office to perform an in-depth verification on the segment (preparation levels of the mailing that are carrier route sorted or in 5 digit bundles for the delivery office) of the next subsequent mailing. The Publisher must be contacted regarding the results of the verifications, assessments applicable, and subsequent actions regarding their mailings.

USPS/NNA-T1-5. Please refer to your testimony on page 12, lines 24 through 25. You state, "As Postal Committee chairman, I have received some comments from publishers who have participated in these public meetings." Please also refer to your testimony on page 12, lines 27 through 28. You state, "Here is an excerpt of an email I received earlier this month, with the names of the postal employees deleted." Please produce a complete copy of this email message that includes the following information: the sender, the recipient, any information in the "cc" field, the subject, the date and time the email was sent, the text of the message, the text of any other message or communication that was attached, appended, or inserted into the email (i.e., the email string or thread), and copies of any attachments to the email.

RESPONSE:

I do not keep exhaustive email files because I receive hundreds of notes a day. The incident I referred to in my testimony derived from this note from a former NNA Board member, Douglas Crews, executive director of Missouri Press Association.

[Email begins here]

From: Doug Crews [mailto:dcrews@socket.net]
Sent: Thursday, September 01, 2011 12:01 PM
To: Tonda Rush; Max Heath
Cc: Brad Gentry
Subject: One report from Post Office closure meeting

Tonda, Max: Are you hearing accounts such as this one?

Brad Gentry, publisher of the Houston (Mo.) Herald, attended a meeting Aug. 31, at the schoolhouse in Success, Mo., where postal officials met with about 40 local residents who were notified by mail of the event. A community organizer asked that someone from the newspaper be present.

Terri Ryan, manager of post office operations, Springfield, Mo., and Melissa Vest, Stockton, Mo., postmistress, discussed possible plans to close the Success postal facility. For the most part, Ryan conducted the meeting.

Gentry said the first order of business by the postal officials was to announce that no audio, video or still photographs would be allowed, or the postal officials would immediately close the meeting and leave.

State Rep. Don Wells (R-Cabool), who was attending the meeting on behalf of U.S. Sen. Roy Blunt, was using a tape recorder and was told to stop and also erase the tape. Rep. Wells asked the postal officials under what authority was audio recording prohibited. He was told, "We will email you a copy of that."

Gentry said the postal officials, when asked questions by the audience, consulted pages of a Q&A script they had brought to the meeting. Members of the crowd were well-behaved, Gentry said, as they gave postal officials several reasons why closing the Success post office would be detrimental to businesses and residents of the community.

As the last question was asked, Gentry said he snapped a photograph of those at the meeting. A moment later, a man approached Gentry and identified himself as a U.S. Postal Inspector, and Gentry was asked to step outside into a hallway.

Gentry said, "He (the postal inspector) was very nice, but I told him to not allow the local newspaper to make a photograph of the meeting is not right. Fifty years from now when researchers want to know how rural post offices were shut down, they will turn to newspaper archives for the story."

While the postal inspector seemed to agree, he told Gentry the two officials were under instructions to conduct the meeting as they did.

Gentry has the photo he made at the meeting. He's not sure if he'll publish it in his newspaper.

He said he wants to continue having his newspaper delivered by the U.S. Postal Service.

(Houston and Success are towns in Texas County, located in south-central Missouri. Recently it was announced the Success post office is one of 167 post offices in Missouri that may be closed by the U.S. Postal Service.

Doug

Doug Crews

Executive Director

Missouri Press Association

Columbia, MO

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USPS/NNA-T1-6. Please refer to your testimony on page 13, lines 31 through 33, and page 14, lines 1 through 2, and Appendix A. You state, “Curious to know how others were experiencing this community dialogue, NNA surveyed newspapers across the country using its own membership list, and asking for assistance from state level newspaper organizations to reach out to our nonmembers. The results of that discussion are attached here as Appendix A, with all the comments that were provided included.” Please also refer to subsection (k) of Rule 31 of the Commission’s Rules of Practice (39 C.F.R. § 3001.31).

(A) Please provide all information required by Rule 31(k), including the following: a description of the study plan underpinning the survey described in your testimony, a clear description of the study design, all relevant assumptions underpinning the survey, the techniques or procedures used to compile the data set forth in Appendix A, the definition of the universe under study, and the sampling frame and units.

RESPONSE:

See my response to Part (C).

USPS/NNA-T1-6 (con't)

(B) If not provided in response to subpart (A) above, please provide the following: the date (month, day, and year) on which the survey began and the date (month, day, and year) on which the survey ended (i.e., the survey period).

RESPONSE:

It began Sept. 10, 2011. The survey is still open for response, but no new responses have been received since Oct 3, 2011

USPS/NNA-T1-6 (con't)

C) If not provided in response to subpart (A) above, please provide a complete copy of the survey, including all questions posed to survey participants, all instructions provided to survey participants, and complete copies of the individual survey responses received from participants. Names of specific individuals may be redacted.

RESPONSE:

NNA created this survey in an online forum called Survey Monkey, which we often use to get a sense of our industry. Questions are not designed with scientific data methods in mind, but rather to learn what our members and others in the industry are thinking. The questions and responses are being provided in an Excel file as an attachment to this response.

(D) If not provided in response to subpart (A) above, please provide the total number of persons who were provided with an opportunity to participate in the survey and the number of those persons who are not NNA members. Additionally, please provide the total number of survey respondents and the number of respondents who are not NNA members. Please also identify any criteria that were used to determine which persons would be provided with an opportunity to participate in the survey.

RESPONSE:

I do not have access to NNA's proprietary membership database. I have not cross tabulated responses to learn which are or are not NNA members. We accepted responses from all newspapers interested in the topics.

(E) If not provided in response to subpart (A) above, please explain the nature and scope of the assistance NNA requested from “state level newspaper organizations” and what assistance was provided in response to NNA’s request.

NNA maintains a close relationship with state newspaper organizations, though those are independent organizations with their own boards of directors and priorities. However, I regularly appear as a speaker on their programs and am aware that postal concerns rank high among their members. At times, when NNA conducts a survey, we ask the executive directors of these organizations to distribute our invitation to participate. I have not tracked which ones accepted our invitation, but I believe at least a dozen or so did. Some state executive directors also serve on the NNA Postal Committee, and the committee members were asked to distribute within their group or state, in an effort to maximize the response base.